

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 10-MJ-10275-DPW
	)	
JOSE L. BAEZ	)	

GOVERNMENT'S ASSENTED TO MOTION TO  
FILE WITNESS LIST WITHOUT ADDRESSES

Now comes the United States, by its attorneys, Carmen M. Ortiz, United States Attorney, and David G. Tobin and Robert Richardson, Assistant U.S. Attorneys, and hereby moves this Honorable Court for authorization to file the Government's Witness List without including addresses for the government witnesses. In support of this motion, the government avers that the inclusion of addresses will pose a threat to the safety of the witnesses. The defendant is charged with setting four arson fires. The government intends to introduce evidence at trial that the defendant's motive for setting each fire was revenge. If the defense needs to contact a witness on the Government's Witness List, the government will facilitate contact between the defense and the witness without revealing the residence or place of employment for that witness. On August 23, 2012, Attorney Michael Ruane, counsel for the defendant, assented to this motion in an email to the undersigned.

Respectfully submitted,

Carmen M. Ortiz  
United States Attorney

By: /s/ David G. Tobin  
DAVID G. TOBIN  
ROBERT RICHARDSON  
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ David G. Tobin  
DAVID G. TOBIN  
Assistant United States Attorney

Date: August 23, 2012